

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Sadie Smith	Chapter 13 Proceeding
Debtor(s) PENNYMAC LOAN SERVICES, LLC Movant	22-11130 ELF
vs. Sadie Smith	Hearing: 8/16/2022 at 10:00 AM.
and KENNETH E. WEST Respondents	

**OBJECTION TO CONFIRMATION OF THE PLAN FILED 6/01/2022**

PENNYMAC LOAN SERVICES, LLC (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 plan and states the following:

1. The plan does not provide for the secured creditor, PENNYMAC LOAN SERVICES, LLC to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on 05/02/2022, Movant is the holder of a secured claim in the amount of \$297,334.71 secured by the Debtors' property located at 6511 North 7th Street, Philadelphia, PA 19126.
3. On or about 6/29/2022, Movant filed a Proof of Claim listing the arrears to be paid through the plan at **\$2,903.09**. A copy of the Proof of Claim is attached hereto and made a part hereof as **Exhibit "A"**.
4. Debtor's Plan proposes to pay Movant **\$0.00** in pre-petition arrears, which is insufficient to provide for Movant's arrearage claim of \$2,903.09. *See* Chapter 13 Plan filed on 6/1/2022 at Docket #15.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Jill Manuel-Coughlin, Esquire  
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Dated: 07/13/2022